

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Pierre G. Thorsen,

Plaintiff,

v.

Community Unit School District 300,

Defendant.

Case No. 3:20-cv-50132

Judge Iain D. Johnston

Magistrate Judge Margaret J. Schneider

JOINT STATUS REPORT

Plaintiff Pierre G. Thorsen (“Thorsen”) and Defendant Community Unit School District 300 (“D300”), hereby submit the following joint status report:

- A. The parties’ last status report reflected ongoing differences over the District’s discovery responses, despite exchanges over the past months. The District continues to maintain that it has provided relevant information in its possession proportionate to the needs of the case. Plaintiff continues to seek discovery of additional information.
- B. Plaintiff had filed a Motion to Compel which was denied, without prejudice, on March 9. Plaintiff intends to file an Amended Motion to Compel, with L.R. 37 Statement in the next seven days.
- C. The parties remain unable to agree on deposition scheduling. Defendant had noticed Plaintiff’s deposition but Plaintiff’s counsel was unable to attend the scheduled date. Defendant has sought to reschedule the deposition for early May. Plaintiff’s position on depositions is that the presence of Pierre Thorsen at these depositions is vital to his case. Pierre Thorsen sustained a severe two-year economic loss following the events described in his Complaint. Pierre Thorsen now has a teaching position at a fraction of

his prior salary and does not want to jeopardize it by taking time off. The school year ends May 20, 2022, so Pierre Thorsen would prefer for depositions to start after then.

D. Discovery is scheduled to close this week. The parties remain unable to agree on the outstanding discovery schedule. Defendant seeks a limited 60-day extension of time given how long this case has been pending. Pierre Thorsen is confident that the parties can complete deposition fact discovery by August 15, 2022, and requests an extension of time to do this.

Dated: April 27, 2022

PIERRE G. THORSEN

By: /s/Timothy J. Lowery

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Dated:

COMMUNITY UNIT SCHOOL
DISTRICT 300

By: /s/ Abigail Rogers

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